

THE ROSEN LAW FIRM, P.A.

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Lead Counsel for Lead Plaintiffs and the Class

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ZHENGYU HE, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CHINA ZENIX AUTO
INTERNATIONAL LIMITED, JIANHUI
LAI, AND MARTIN CHEUNG,

Defendants.

Case No. 2:18-cv-15530-KM-JSA

CLASS ACTION

**NOTICE OF MOTION AND
MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT
AND PLAN OF ALLOCATION**

Motion Day: October 8, 2021

Hon. Kevin McNulty

Pursuant to the Court's Order Granting Plaintiffs' Motion for Preliminary Approval of Class Action Settlement dated June 29, 2021 (Dkt. No. 52), on October 8, 2021 at 2:00 p.m., or as soon thereafter as counsel may be heard, at 50 Walnut Street, Courtroom PO 04, Newark, New Jersey 07102, before the Honorable Kevin McNulty, United States District Judge, Lead Plaintiffs ITENT EDV Dienstleistungs GmbH and Ing. Richard Deutner Softwareentwicklung & Beratung ("Plaintiffs"), on

behalf of themselves and all members of the proposed Settlement Class, through their undersigned counsel, will respectfully move for final approval of the class action Settlement and Plan of Allocation of Settlement proceeds.

Plaintiffs' motion is based on: (i) a memorandum of law in support; (ii) the Declaration of Laurence M. Rosen in Support of the Motions for: (1) Final Approval of Proposed Settlement; and (2) Award of Attorneys' Fees, Reimbursement of Expenses, and Awards to Plaintiffs, and the exhibits thereto; (iii) the Stipulation and Agreement of Settlement ("Stipulation"), filed on April 26, 2021 and the exhibits thereto (Dkt. No. 49); and (iv) all other pleadings and matters of record and such additional evidence or arguments as may be presented at the hearing.

The [Proposed] Order and Judgment, negotiated by the Parties and previously attached as Exhibit B to the Stipulation (Dkt. No. 49-6), is submitted herewith.

Dated: September 10, 2021

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

By: /s/ Laurence M. Rosen

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*Lead Counsel for Lead Plaintiffs and
the Class*

CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2021, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Laurence M. Rosen

Laurence M. Rosen